



Kevin Fritz
Partner
Direct (212) 655-3570
Fax (212) 655-3535
kaf@msf-law.com

Via ECF

Hon. Lewis J. Liman
United States District Court
Southern District of New York
500 Pearl Street, Room 1620
New York, NY 10007

June 2, 2025

**Re: *Lively v. Wayfarer Studios LLC et al.*, No. 1:24-cv-10049-LJL;
rel. *Wayfarer Studios LLC et al. v. Lively et al.*, No. 1:25-cv-00449-LJL**

Dear Judge Liman:

On behalf of Wayfarer Studios LLC, Justin Baldoni, Jamey Heath, Steve Sarowitz, It Ends With Us Movie LLC, Melissa Nathan, The Agency Group PR LLC, and Jennifer Abel (collectively, the “Wayfarer Parties”), we write pursuant to Rule 4.b of Attachment A to Your Honor’s Individual Rules to respectfully request that the Court preliminarily seal Exhibits A and B to the Wayfarer Parties’ Motion to Compel, filed contemporaneously herewith. Exhibits A and B are Blake Lively’s responses and objections (and her amended version thereof) to the Wayfarer Parties’ Second Set of Requests for Production, which Ms. Lively designated as confidential. In accordance with Rule 4.b of Attachment A, the Wayfarer Parties respectfully request that the Court not rule on this letter-motion to seal for one week, so that the parties can meet and confer, and Ms. Lively may file a motion for continued sealing if she so chooses.

Respectfully submitted,

/s/ Kevin Fritz

MEISTER SEELIG & FEIN PLLC
Mitchell Schuster
Kevin Fritz
125 Park Avenue, 7th Floor
New York, NY 10017
Tel: (212) 655-3500
Email: ms@msf-law.com
kaf@msf-law.com

LINER FREEDMAN TAITELMAN + COOLEY, LLP
Bryan J. Freedman (*pro hac vice*)
Ellyn S. Garofalo (*pro hac vice*)
Miles M. Cooley (*pro hac vice*)
Theresa M Troupson (*pro hac vice*)
Summer Benson (*pro hac vice*)

Hon. Lewis J. Liman
Page 2
June 2, 2025

Jason Sunshine
1801 Century Park West, 5th Floor
Los Angeles, CA 90067
Tel: (310) 201-0005
Email: bfreedman@lftcllp.com
egarofalo@lftcllp.com
mcooley@lftcllp.com
ttroupson@lftcllp.com
sbenson@lftcllp.com
jsunshine@lftcllp.com

Mitra Ahouraian (*pro hac vice*)
2029 Century Park East
4th Floor
Los Angeles, CA 90067
(310) 376-7878
Email: mitra@ahouraianlaw.com

cc: all counsel of record (via ECF)